

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIAN BAUMANN,

Plaintiff,

V.

CHARLES LORD,

Defendant.

Case No. 07-7228

Judge Zagel

Magistrate Judge Brown

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Charles Lord hereby moves for a thirty-day extension of time in which to answer or otherwise plead to Plaintiff Marian Baumann's Complaint. In support of this Motion, Lord states as follows:

1. Lord removed this action to this Court from the Circuit Court of Cook County, Illinois on December 26, 2007.
2. Under Federal Rule of Civil Procedure 81(c)(2)(C), Lord's answer or responsive pleading is currently due on January 4, 2008.
3. Both before and after Lord removed this action to this Court, the parties have been engaged in attempts to resolve this matter.
4. The parties believe that, if given a short period of time in which to further discuss resolution, they may be able to resolve this matter without need for further litigation in this Court.

5. The parties intend to hold a face-to-face meeting in the next thirty days, perhaps with the assistance of a private mediator, to discuss resolution.
6. Accordingly, Lord wishes to wait until the parties have taken this opportunity for early resolution before answering or otherwise responding to Baumann's Complaint.
7. Lord's counsel discussed this matter with Baumann's counsel prior to filing this Motion. Baumann's counsel has no objection to a thirty-day extension of time for Lord to answer or otherwise respond to the Complaint.

WHEREFORE, Lord respectfully requests that the Court grant this Motion and extend his deadline to answer or otherwise respond to the Complaint by thirty days, or until February 4, 2008.

Dated: January 4, 2008

CHARLES LORD

By: /s/ Jane M. McFetridge
One of His Attorneys

Jane M. McFetridge
Neil H. Dishman
Jackson Lewis LLP
320 West Ohio Street, Suite 500
Chicago, IL 60610
(312) 787-4949

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on January 4, 2008, he caused a true and correct copy of the foregoing Defendant's Unopposed Motion for Extension of Time to Answer or Otherwise Plead to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system, including:

William Lynch Schaller
Peter P. Tomczak
Baker & McKenzie LLP
Suite 3500
130 East Randolph
Chicago, IL 60601

/s/ Neil H. Dishman
Neil H. Dishman